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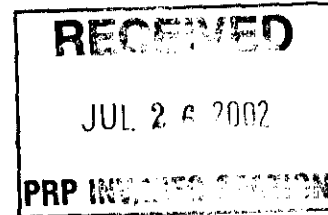
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Reply to: Havertown Office

July 22, 2002

Ms. Joan Armstrong, Chief
PRP Investigation and Site
Information Section
U.S. Environmental Protection Agency
1650 Arch Street
Philadelphia, PA 19103-2029



**RE: Required Submission of Additional Information
Lower Darby Creek Area Superfund Site -
Clearview Landfill, Folcroft Landfill and
Folcroft Landfill Annex**

Dear Ms. Armstrong:

In reply to your letter of July 3, 2002 requesting additional information as set forth in Enclosure F of your letter, I am hereby responding on behalf of Mr. Richard Heller:

Enclosure F

Answers to Information Requested:

1. The tenants or former tenants listed in Question No. 1 did not have written lease arrangements or agreements with Mr. Richard Heller and/or Clearview Land Development Company, to his knowledge.

2. (a) City Wide Services, Inc. This Company had an oral lease agreement with Mr. Edward Heller and, over the years, paid varying amounts of rent from between \$2,500 - \$5,000 on a monthly basis. No rent has been paid since the death of Edward Heller. City Wide Services, Inc. has always been a subtenant of Richard Heller. In addition to the aforesaid monthly payments, the verbal lease arrangement called for Mr. Richard Heller to pay all real estate taxes on the property on a yearly basis.

(b) Bob O'Donnell Company - This Company is a subtenant of Richard Heller and has a verbal lease agreement for a portion of the property leased by Richard Heller from Clearview Land Development Company.

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(c) Hercules Hose Company - This Company is no longer a tenant but did in the past have a verbal lease agreement with City Wide Services, Inc.

(d) DiLorenzo Company - This Company is no longer a tenant but did in the past have a verbal lease agreement with Mr. Richard Heller.

(e) Robert Cianci Vehicle Junkyard - This Company is no longer there because they failed to pay rent and subsequently moved.

(f) Roma Associates - This Company is no longer there because they failed to pay rent and subsequently moved.

(g) Piotti Construction - This Company pays the sum of \$400 to Richard Heller per month per verbal lease agreement.

(h) C&E Transfer Companies - This Company has never been a tenant and has never paid rent to anyone, however, they were allowed the use of some of the facilities at the site for equipment and business purposes as a courtesy extended by Mr. Richard Heller to his wife, Faye Heller.

(i) Philly Fasteners, Inc. - This Company has never been a tenant and has never paid rent to anyone, however, they were allowed the use of some of the facilities at the site for equipment and business purposes as a courtesy extended by Mr. Richard Heller to his wife, Faye Heller.

(j) Enforcement Towing - This was a former tenant of Mr. Richard Heller and this Company paid rent per verbal agreement to Mr. Heller.

3. It was always the understanding of Mr. Richard Heller that his mother, Ethel Heller, owned at least 99% of all outstanding stock issued by the Clearview Land Development Company, Inc. Mr. Richard Heller also believes that by virtue of

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her stock ownership, she also owned, at least in name only, the Clearview Land Development Company and its assets, which include the site at 84th Street and Buist Avenue. The property itself is titled under the name of Clearview Land Development Company, Inc. Therefore, technically speaking, Clearview Land Development Company, Inc., a Pennsylvania corporation, is the owner of the subject property.

4. Mr. Richard Heller personally paid the real estate taxes on the subject property from 1974 to present, as part of the lease agreement between himself and the Clearview Land Development Company, Inc.

5. Refer to answer to No. 4.

6. Mr. Richard Heller has been advised by his former attorney, James A. Lynch, Sr., now deceased, that his mother, Ethel Heller, died intestate. Mr. Richard Heller does not know if her estate was ever probated by her husband, Mr. Edward Heller, nor does he know as to whether or not her share in the Clearview Land Development Company were ever transferred to other individuals.

7. Mrs. Ethel Heller died on October 25, 1995.

8. Mr. Heller has no access nor copies of the requested tax returns and has no idea whatsoever if they were even filed.

9. Mr. Heller has no copies of any probate filings in any state for the Estate of Ethel Heller. However, the executors of the Estate of Edward I. Heller, are his daughters, Barbara Shapiro and Corrine Fishman, both of the State of Florida, and they may have probate filings that were filed in connection with the Ethel Heller Estate.

10. Mr. Heller has none of the records requested in this paragraph, nor does he know them to exist. However, he suspects that if any of these documents do exist, they were in the

possession of his father, now deceased. Mr. Heller has no access to these records as he is not the Executor of his father's Estate.

11. Refer to Answer to Question 10.

12. Refer to Answers provided to Questions 9, 10 and 11.

13. Mr. Richard Heller has no knowledge that Ethel Heller created any trust or was the beneficiary of any trust.

14. Mr. Heller has no knowledge of any such transactions.

15. Refer to Answers to Questions 9, 10 and 11.

16. Mr. Richard Heller believes that the Executor of Ethel Heller's Estate was his father, Edward Heller, also known as Isadore Edward Heller.

17. Mr. Richard Heller has no knowledge as to the assets of his mother's estate nor does he know whether her stock, if any, was ever distributed.

18. Mr. Richard Heller has no knowledge as to the last date by which creditors were permitted to file claims against the Estate of Ethel Heller as he was not involved in the disposition of her Estate or her assets.

19. Mr. Richard Heller has been advised that his mother had no Will and he does not believe her Estate was ever probated as all of this was the responsibility of his father.

20. Mr. Edward Heller died on October 11, 2000.

21. Mr. Richard Heller has no copies of the requested tax returns, nor does he know whether or not they exist.

22. Mr. Richard Heller has no copies of any probate filings. The Executors of his father's Estate were Edward

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Heller's two daughters, Barbara Shapiro and Corrine Fishman, both of the State of Florida.

23. Mr. Richard Heller has no personal knowledge nor does he have copies of the requested documents. Please refer these questions to the aforementioned Executrixes of the Estate.

24-27. Refer to Answers to Questions 22 and 23.

28. Mr. Richard Heller has been advised that the only assets of his father's Estate were a condominium in Miami Beach, Florida. It is his understanding that the condominium was sold and the proceeds were divided and he received the sum of either \$2,500 or \$3,500, as his share.

29. Barbara Shapiro and Corrine Fishman.

30. Refer to Answers to Questions 22 and 23.

31. Refer to Answer to Question 22.

32. Mr. Richard Heller does not have any of these documents and would refer you to the aforementioned Executrixes of the Estate.

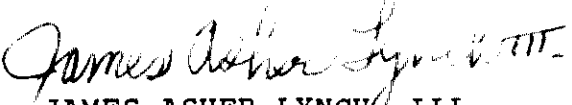
33. Mr. Richard Heller was advised by Bankruptcy counsel to list an "equitable interest" in the property located at Avenue A and Darby Creek Road, Darby Township, PA. Mr. Heller personally has no idea as to the extent of his equitable interest in the property, if any. He is still a tenant at the property by virtue of a long-standing verbal lease agreement with Clearview Land Development Company, but he is paying no monthly rental.

34. Mr. Heller does not have any company known as C&E Transfer Company. He owns no stock in the aforesaid company, nor is he an officer, director or employee.

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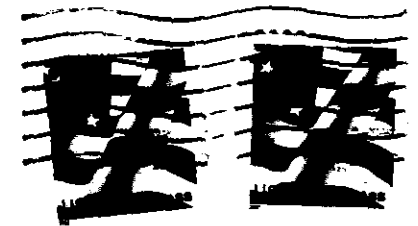
35. Refer to Answer to Question 34.

Very truly yours,


JAMES ASHER LYNCH III

JAL/rlw

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